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Via Federal Express

November 26, 2014

Terry Andrews, Project Manager
Remediation Division - Superfund section
TX Commission on Environmental Quality
PO. Box 13087
Austin, TX 78711

Re: CES Environmental Services Inc. Facility
4904 Griggs Road, Houston, Harris County, Texas – SWR #30900
Response to Request for Information

Dear Ms. Andrews:

This letter and its attachments (the "Response") are submitted by the General Electric Company (GE) in response to the TCEQ Request for Information Pursuant to the Texas Solid Waste Disposal Act, Tex. Health & Safety Code, SS 361.001-361.966 (the Request), dated August 28, 2014, regarding the CES Environmental Services Inc. facility in Houston, Texas (the CES Site). While the Request was directed to several facilities organized within GE's Oil & Gas business unit (GE O&G), as described in the enclosed response, GE's search for responsive information encompassed each of the company's business units including affiliated entities, and this Response is accordingly submitted on behalf of GE Company as opposed to solely GE O&G. GE appreciates TCEQ's decision to grant GE's request for a 60 day extension of time to gather information and respond (until December 1, 2014).

As detailed in the enclosed response, GE conducted a comprehensive, good faith investigation in response to the information request. Our investigation indicates that several facilities or entities organized within GE's Oil & Gas (GE O&G) and Power & Water (GE P&W) business units engaged CES to provide various services, including transportation, brokering, recycling, and cleaning services (in most cases these transactions occurred prior to the time GE acquired the entities or facilities in question). Importantly, in many cases the services CES provided were limited to brokering and/or transporting materials to third-party facilities. In the case of these transactions, there is no evidence or indication that materials were ever taken to, stored or handled at the CES facility on Griggs Road in Houston; accordingly such transactions are outside the scope of this response. CES also apparently performed on-site consulting services at one GE facility that did not involve shipment of any materials off-site; and in at least one instance a GE facility purchased materials from CES. Again, such transactions are outside the scope of this response, which provides information and documents relevant to transactions by GE or affiliated entities in which materials were transported to the CES facility on Griggs Road in Houston. Based on GE's investigation, many of these shipments consisted of RCRA-empty drums and totes, or oily water consisting of 95-99% water.

Additionally, at the October 22 meeting hosted by TCEQ regarding the CES site, TCEQ indicated that it was primarily interested in transactions that occurred during the last couple years of CES' operation (2009 and 2010). In this regard, note that only a single transaction covered by this request occurred after January 1, 2009.

GE reserves the right to amend, modify, correct, supplement or otherwise change this Response if additional information becomes available that would make such changes appropriate.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Florio', with a stylized flourish at the end.

Roger Florio
Counsel Environmental Remediation

cc: Cody Platt
Mary T. Sullivan

I. GENERAL OBJECTIONS

General Electric Company (GE) submits this response to the Texas Commission on Environmental Quality's (TCEQ's) August 28, 2014 Request for Information, which was directed to facilities organized within two of the Company's business units, GE Power & Water and GE Oil & Gas. These general objections apply to each of the information request questions and are incorporated into each of the responses to the questions set forth below. GE is providing the enclosed information to the extent that it is relevant, reasonably obtained, and subject to the following objections (the General Objections):

- I. GE objects to the scope and breadth of the Request to the extent that it seeks information that is not relevant to legislative purposes of the Texas Solid Waste Disposal Act (the Act) and is otherwise outside the scope of TCEQ's authority under the Act. GE believes that portions of the Request are overbroad, burdensome, vague and otherwise not in accordance with law and has responded only to those questions or portions of questions relating to or which could reasonably be expected to provide relevant information regarding a potential nexus to the CES Environmental Services Inc. facility.
- II. GE objects to each request to the extent that the requests may be construed as demanding that GE conduct investigations and search for documents in facilities and locations not concerned with the issues involved in this case. GE is a large decentralized company. It would be impracticable and unreasonable to search all locations for the broad classes of documents demanded herein. Similarly, GE objects to each request to the extent such requests may be construed as demanding that GE provide information or documents relating to services provided by CES that did not involve shipment, storage, handling, disposal, etc. of such materials at or to the CES site.
- III. GE objects to each request to the extent that the requests use terms that are undefined, overbroad, arbitrary and capricious, vague, ambiguous, irrelevant, unduly burdensome or otherwise not in accordance with the law.
- IV. GE objects to providing information which: (1) is not in its possession, custody or control; (2) is in the possession, custody or control of TCEQ or third parties (we note that CES' records were reportedly confiscated by TCEQ in 2011), or (3) is otherwise beyond the scope of TCEQ's authority under the Act.
- V. Notwithstanding and without waiving these objections, and subject to them, GE has prepared this response based upon the information available to it. Where requests are vague, ambiguous, overbroad, unduly burdensome, or beyond the scope of TCEQ's authority pursuant to the Health and Safety Code, GE is making appropriate and reasonable efforts to provide responsive information based on GE's interpretation of the requests.

GE reserves the right to amend, modify, correct, supplement or otherwise change this response if additional information becomes available that would make such changes appropriate, although we believe that we are under no continuing obligation to make any such changes or subsequent filings. Subject to and without waiving the foregoing objections, GE's response follows.

II. Summary of Investigation

In response to the TCEQ Request for Information (Request), GE conducted a comprehensive, good faith investigation of all reasonably available information concerning facilities owned or operated by GE and affiliated companies (excluding warehouse or office facilities) that operated within a fifty mile radius of the CES site during the relevant time period (calendar years 2002 through 2010, inclusive). For the sake of convenience, facilities owned by GE's direct or indirect subsidiaries or affiliated entities are sometimes referred to as GE facilities below.

GE's investigation included an examination of all available, potentially relevant documents in the possession, custody and control of GE or its affiliates, as well as consultation with current employees with potential knowledge of transactions with CES. Among the available records reviewed were records maintained at multiple facilities owned by GE or affiliated companies, records retained at records retention facilities, accounting transaction databases, and document management databases. Hundreds of pages of reports, letters, and waste manifests were reviewed to determine whether the facilities in question conducted any transactions with CES or shipped any materials to the CES site.

III. Responses to Questions

1. Discuss GE's relationship to this site.

Response: As detailed in the enclosed response, GE conducted a comprehensive, good faith investigation in response to the information request. Our investigation indicates that several facilities or entities organized within GE's Oil & Gas (GE O&G) and Power & Water (GE P&W) business units engaged CES to provide various services, including transportation, brokering, recycling, and cleaning services (in most cases these transactions occurred prior to the time GE acquired the entities or facilities in question). Importantly, in many cases the services CES provided were limited to brokering and/or transporting materials to third-party facilities. In the case of these transactions, there is no evidence or indication that materials were ever taken to, stored or handled at the CES facility on Griggs Road in Houston; accordingly such transactions are outside the scope of this response. CES also apparently also performed on-site consulting services at one GE facility that did not involve shipment of any materials off-site; and in at least one instance a GE facility purchased materials from CES. Again, such transactions are outside the scope of this response, which provides information and documents relevant to transactions by GE or affiliated entities in which materials were transported to the CES facility on Griggs Road in Houston. Based on GE's investigation, many of these shipments consisted of RCRA-empty drums and totes, or oily water consisting of 95-99% water.

Additionally, at the October 22 meeting hosted by TCEQ regarding the CES site, TCEQ indicated that it was primarily interested in transactions that occurred during the last couple years of CES' operation (2009 and 2010). In this regard, note that only a single transaction covered by this request occurred after January 1, 2009.

2. Provide the name(s), address(es), and any facility identification numbers for any businesses which were associated with this site. Include any knowledge regarding persons or companies that sold, transported, generated, treated, stored, or disposed of hazardous substances, including product or waste material at this time. Include all material that may have been sent for reclamation.

Response: Names, Addresses and Facility Identification Numbers are provided below. As indicated above, GE O&G and GE P&W sometimes used CES for transportation or brokerage of materials to other facilities (i.e., not the CES Griggs Road facility). Please see exhibits to the Response for more detailed information regarding transactions.

GE OIL AND GAS	
16240 Port Northwest, Suite 100 Houston, TX EPA ID No. TXR000057315	Vetco Gray - Houston 12221 N. Houston Rosslyn Road Houston, TX 77086 EPA ID No. TXD060720505
Vetco Gray - Navasota 9930 Industrial Drive Navasota, TX 77868 EPA ID TXR000068569	Vetco Gray - Bryan 2870 North Harvey Mitchell Bryan, TX 77808 TXR000048652
Hydril USA Technology Center 3300 Sam Houston Parkway Houston, TX EPA ID No. TXD988059184	Hydril USA Humble Plant 18000 Eastex Freeway Humble, TX EPA ID No. TXD096617907

GE POWER AND WATER	
GE Betz, Inc. 3901 Williams Dr. Orange, TX 77830 EPA ID No. TXD042917401	

3. List all materials generated, treated, stored, or disposed of at this site. Include all common name(s) or the name(s) listed on known Material Safety Data Sheets (MSDS) and, if available, the International Union of Pure and Applied Chemistry (UPAC) name.

Response: GE responds to this question as follows:

GE O&G, 16240 Port Northwest, Suite 100, Houston, TX 77041:

See materials listed in the summary spreadsheet provided as Exhibit A; see also 2007, 2008 and 2010 Annual Waste Reports and CES Profile for coolant, air and water, provided as Exhibit B.

GE O&G (Vetco Gray), 12221 N. Houston Rosslyn Road, Houston, TX 77086:

See materials listed in summary spreadsheet provided as Exhibits A; see also Manifests, Bills of Lading and Invoices provided as Exhibit C. and CES Waste Description, Vetco Waste Classification Documentation Forms, Waste Pre-Acceptance Approval Letters and MSDS as Exhibit D.

GE O&G (Vetco Gray Navasota), 9930 Industrial Drive, Navasota, TX 77868:

See materials listed in summary spreadsheet provided as Exhibit A; see also Manifests, Bills of Lading and invoices provided as Exhibit E.

GE O&G (Vetco Gray Bryan) 2870 North Harvey Mitchell, Bryan, TX 77808:

See materials listed in summary spreadsheet provided as Exhibit A; see also Manifest, Bill of Lading and invoice provided as Exhibit F.

GE O&G, Hydril Technology Center, Houston Parkway, Houston, TX:

See materials listed in summary spreadsheet provided as Exhibit A; see also 2008 Annual Waste Report (note: transactions involving shipments to sites other than CES have been redacted), Manifests, Bills of Lading and Waste Profile Re-certification Forms provided as Exhibit G.

GE O&G, Hydril Humble Plant, 18000 Eastex Freeway, Humble, TX:

See materials listed in summary spreadsheet provided as Exhibit A; see also 2006, 2007 and 2008 Annual Waste Reports (note: transactions involving shipments to sites other than CES have been redacted), Manifests, CES Waste Descriptions provided as Exhibit H.

GE Betz, Inc. (formerly Betz Dearborn, Inc.), 3901 Williams Dr., Orange, TX 77830:

See materials listed in summary spreadsheet provided as Exhibit A; see also Acknowledgements of Bills of Lading provided as exhibit I.

Two other GE Betz facilities (one located at 10658 Highway 90, Beaumont, TX 77713, and another located at 9669 Grogans Mill Road, the Woodlands, TX 77380), also engaged in limited transactions with CES, but based on our investigation the former involved materials transported by CES to a third-party facility (i.e., did not involve shipments of materials to Griggs Road) and the latter involved a purchase of batteries from CES; thus these transactions are outside the scope of this response.

4. *Provide any analytical data associated with material generated, treated, stored, or disposed of at this site.*

Response: See Exhibits A through I.

5. *Provide the dates in which GE may have had any involvement with the site. Include dates of disposal, volumes of hazardous substances disposed, and all waste characterization sheets. Provide all documents associated with any material transported to this site, including bills of lading, hazardous and non-hazardous waste manifests, transportation tickets, and any other documents which could be associated with the facility operations at this site.*

Response: Transactions involving shipments of material to the site occurred between 2002 and 2009. See Exhibits A through I.

6. *Provide information pertaining to the identification of soils, groundwater, or surface water at the site that may have been or may be affected by an actual or threatened release of a hazardous substance. Include the nature or extent of any release or threatened release of a hazardous substance at or from the site.*

Response: GE has no information responsive to this request.

7. Please include any additional information you have that may be useful in determining the site's operational history, including company names, business organization history, property ownership records, and current or historic property survey.

Response: GE has no information responsive to this request other than the documents provided with this response.